REMARKS/ARGUMENTS

Reconsideration and allowance of this application are respectfully requested. Currently, claims 4-10, 12-16, 21-26 and 29-33 are pending in this application.

Request for Approval of Replacement Drawing:

Applicant filed a replacement drawing for Fig. 2 and an annotated sheet showing changes with the Amendment/Response filed March 22, 2004. Applicant respectfully requests entry and approval thereof.

Rejection Under 35 U.S.C. §102:

Claims 1, 4-16, 21-26 and 29-33 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Iverson et al (U.S. '664, hereinafter "Iverson"). Applicant respectfully traverses this rejection with respect to still pending claims 4-10, 12-16, 21-26 and 29-33.

For a reference to anticipate a claim, each element must be found, either expressly or under principles of inherency, in the reference. Each element of the claimed invention is not found in Iverson. For example, Iverson fails to disclose or even suggest encrypting each of a multiplicity of data frames with a different key and then decrypting the data frames using keys.

Section 4 (pages 9-10) of the Office Action alleges "wherein it is inherent by disclosing encoded multimedia bitstream comprises video frames (col. 3, lines 5-7 and col. 6, lines 24-29) involves encryption that includes generated random number generator that uses a seed value for each key frame (col. 9, lines 59-66) (emphasis added)." Applicant respectfully disagrees with the apparent allegation that Iverson's disclosure of encoded multimedia bitstream inherently discloses encrypting each of a multiplicity of data frames with a different key and then decrypting the data frames using keys as claimed. Indeed, col. 2, line 56 to col. 3, line 4 of Iverson describes applying an encryption scheme to file data to generate an encrypted file. This encrypted file would have to be decrypted before being played. However, this portion of Iverson

concludes by describing disadvantages of an encryption/decryption scheme by stating "the delays resulting from performing the decryption procedure may be undesirable for applications that are designed to play audio/video sequences to simulate real-time sound and motion."

Iverson then contrasts the encryption/decryption procedures described in col. 2, line 56 to col. 3, line 4 with a disclosed scheme for "controlling the access that a user has to an encoded multimedia bitstream (emphasis added)." (See col. 3, lines 5-16). Accordingly, col. 3, lines 5-16 describes Iverson's system in which an encoded multimedia bitstream does not suffer from the disadvantages of the encryption/decryption procedure. The explicit language described in col. 2, line 56 to col. 3, line 16 of Iverson itself explicitly describes that there is a difference between "encrypting" and "encoding."

Accordingly, encrypting a multiplicity of data frames with different keys is clearly not "inherent" in view of Iverson's teaching of encoding data. Iverson itself explicitly discloses that encrypting and encoding are different concepts. The rationale of the Office Action simply ignores these explicit teachings of Iverson contrasting encryption with encoding. Again, Iverson explicitly contrasts encryption (described in col. 2, line 56 to col. 3, line 4) with encoding (as described in col. 3, lines 5-16). These portions of Iverson clearly present encryption and encoding as alternative procedures.

Page 10 of the Office Action makes further reference to a Microsoft computer dictionary with purports to define encryption as "encode (scramble) information in such a way that it is unreadable to all but those individuals possessing the key to the code."[1] It is significant to note that this definition indicates that information is scrambled in such a way that it is *unreadable* to all but those individuals possessing the *key* to the code. In other words, encryption requires some

[1] Applicant respectfully requests that the next Office Action provide a copy of this portion of the Microsoft computer dictionary.

time of a cryptographic algorithm and a cryptographic key to make information secret. Indeed, independent claims 12 and 32-33 require encrypting a plurality of data frames with a different key.

In contrast, the frame data encoder described in Iverson processes the current frame to generate encoded data using standard video encoding techniques. (See col. 6, lines 25-35). One skilled in the art would clearly realize that such standard video encoding techniques do not involve any secrecy. No key is used to encrypt the data and make it secret. Somebody who knows which technique was used to encode the data frame code easily decode it without any additional knowledge.

With respect claims 32-33, page 9 of the Office Action makes explicit reference to col. 8, lines 55-58. This portion of Iverson states "The computationally simple method employed to hash the access word has several disadvantages. First, it produces a lock word which differs for each encoded frame, which makes the key frame lock-word field much more difficult to detect." However, the lock word is only encoded into the frame header. That is, it prefixes the frame data. The lock word is not used as an operator on the frame data itself. The lock-word of Iverson is not used as an operator to encrypt the data frame. Rather, the frame data is in the clear.

Col. 8, lines 39-54 of Iverson provides further evidence that the lock-word of Iverson has nothing to do with an encryption key. This portion of Iverson describes the purpose of the lock-word and what would happen if someone turned-off the key-frame lock-word protection. What is clear is that they would not have to decrypt any of the frame data. Rather, they would have to reconstruct the headers and adjust the frame size.

Accordingly, Applicant respectfully requests that the rejection in view of Iverson be withdrawn.

Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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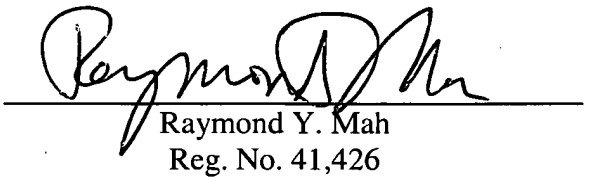
By: 
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